

**UNITED STATES DISTRICT COURT
FOR THE
EASTERN DISTRICT OF MICHIGAN**

WILLARD L. SLOAN, et al.,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No. 2:09-cv-10918 –PDB-MKM
)	
BORGWARNER INC., et al.)	
)	
Defendants.)	

**STIPULATION BETWEEN NON-PARTY UAW, PLAINTIFFS AND DEFENDANTS
FOR THE ENTRY OF A PROTECTIVE ORDER**

1. On September 1, 2011, Defendants served on non-party International Union, United Automobile, Aerospace and Agricultural Implement Workers (UAW) a Subpoena to Produce Documents, Information, or Objects.

2. On September 16, 2011, the UAW served its objections to the subpoena in which it represented that, notwithstanding its objections, it would produce documents that are relevant to the subject matter of the litigation or calculated to lead to the discovery of admissible evidence at a mutually agreed time and place.

3. In its subpoena, Defendants requested that the UAW produce documents which are confidential in nature and therefore the appropriate subject of a protective order. The UAW is willing to produce such documents subject to a protective order to be entered by the Court.

4. The parties agree to comply with the terms of the attached protective order with respect to documents produced by the UAW that contain confidential information.

IT IS THEREFORE STIPULATED AND AGREED that the attached protective order may be entered by the Court to govern the production of the documents described therein.

Dated: December 13, 2011

s/ with consent of Barry A. Macey
Barry A. Macey, (Ind. Bar No. 8964-49)
MACEY SWANSON AND ALLMAN
445 N. Pennsylvania Street
Suite 401
Indianapolis, IN 46204
Telephone: (317) 637-2345
Email: bmacey@maceylaw.com

Attorneys for UAW

s/Joshua David Rogaczewski
Joshua David Rogaczewski
McDERMOTT WILL & EMERY LLP
600 13th Street N.W.
Washington, D.C. 20005
Telephone: (202)756-8195
Email: jrogaczewski@mwe.com

Attorneys for Defendants

s/ with consent of David Radtke
David Radtke
KLIMIST, McKNIGHT, SALE, McCLOW &
CANZANO, P.C.
400 Galleria Officentre, Suite 117
Southfield, MI 48034
Telephone: (248) 354-9650
Email: dradtke@kmsmc.com

Attorneys for Plaintiffs